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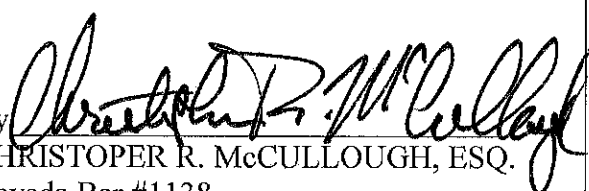
COMES NOW, Plaintiff, GILMORE CONSTRUCTION, LLC a Nevada Limited Liability Company, by and through its counsel of record Christopher McCullough, Esq., of McCULLOUGH & DOBERSTEIN, LTD, and Defendants Robert H. Seabrook and Sondra G. Seabrook, by and through their counsel of record Timothy Thomas, Esq. of Law Office of Timothy P. Thomas, LLC, do hereby stipulate that the above Adversary Proceeding, having reached a final judgment, shall be dismissed, as set forth below.

1. It is recognized that the above adversary proceeding has reached a final judgement determining that the Debtors/Defendants are subject to a non-dischargeable debt to Plaintiff in the amount of \$548,739.02 based upon the Order of Restitution set forth in criminal proceedings Clark County, Nevada. Such restitution order is non-dischargeable pursuant to 11 U.S.C. 727(a)(4), based upon the criminal judgment determination of Theft against Defendant Sondra Seabrook (Case No. C-14-301112-2) and the determination of Theft against Defendant Robert Seabrook (Case No. C-14-301112-1).
2. The Debtor's listed certain retirement accounts held by the following institutions ("Retirement Accounts") as exempt assets under 11 U.S.C. 522 and NRS 21.090:
 - a. Ameritrade Inc. Acct. xxxxx0880
 - b. Ameritrade Inc. Acct. xxxxx0199
 - c. Franklin Templeton Acct. xxxxx0385
 - d. Franklin Templeton Acct. xxxxx0749
 - e. Houldsworth 401k xxxxx406
3. On August 7, 2013, Debtors entered into a Stipulation and Order for Issuance of a Preliminary Injunction Precluding Robert And Sondra Seabrook from Transferring Assets ("Stipulation for Injunction").

- 1 4. That Plaintiff was deemed by the Court to have asserted an informal objection to
2 exemption of the Retirement Account by entry of the Stipulation for Injunction.
- 3 5. That the Parties now seek to terminate and finalize the Adversary Proceeding and
4 therefore the Parties agree that,
- 5 a. The Stipulation for Injunction is hereby lifted, released and annulled,
6 b. The Court shall Release the Stipulation for Injunction and grant relief from the stay
7 of any distribution of the Retirement Accounts
8 c. The remaining issues in the Adversary Proceeding, specifically the tracing of funds
9 under the judgment be hereby dismissed and any remaining hearing dates, trial dates
10 or status dates be vacated.
11 d. The judgment entered in the Adversary Proceeding remain a final determination of
12 the matter granting Plaintiff a non-dischargeable claim for recovery of the restitution
13 award arising from the criminal judgment.
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Dated: 1-29-2018

McCULLOUGH & DOBERSTEIN

20 By 
21 CHRISTOPHER R. McCULLOUGH, ESQ.
22 Nevada Bar #1138
23 601 So. Rancho Drive, #A-10
24 Las Vegas, NV 89160
25 Attorney for Plaintiff
26 Gilmore Construction, LLC a Nevada Limited
27 Liability Company
28

Dated: 2-15-18

Law Office of Timothy P. Thomas, LLC

By 
TIMOTHY P. THOMAS, ESQ.
Nevada Bar #5148
1771 E. Flamingo Rd. Suite B-212
Las Vegas, NV 89119
Attorney for Defendants
Sondra Seabrook and Robert Seabrook

ORDER

Based upon the foregoing stipulation of the parties and good cause appearing,

IT IS SO ORDERED.

Submitted by:

LAW OFFICE OF TIMOTHY P. THOMAS, LLC

By: 

TIMOTHY P. THOMAS, ESQ.

Nevada Bar # 5148

1771 E. Flamingo Rd., Ste. B-212

Las Vegas, Nevada 89119

Attorney for Defendants

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